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March 11, 2016

via email: julie.saare-edmonds@water.ca.gov

Julie Saare-Edmonds
Water Use and Efficiency
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-001

**Subject: Comments on Recommendations Report to the Legislature
on Landscape Water Use Efficiency**

Dear Ms. Saare-Edmonds,

Eastern Municipal Water District (EMWD) appreciates the opportunity to comment on the Independent Technical Panel on Demand Management Measures (ITP) Recommendations Report to the Legislature on Landscape Water Use Efficiency. The ITP has an ambitious goal to reduce water use on landscaping. EMWD supports efforts to improve landscape efficiency across the State and the ITP efforts to develop recommendations toward that end.

In general, EMWD recommends that a cost benefit analysis be completed to evaluate the effort and cost needed to implement each recommendation and the resulting water saving that may be achieved. Cost should include impacts to local and state agencies, utilities, and consumers. In addition to this general recommendation, EMWD proposed the following specific recommendations:

Section 3: ITP Vision Statement

The recommend goal for the State is to "reduce potable water use on urban landscapes on the order of fifty percent from pre-drought level over the next 20 years". This goal does not recognize that California is still growing and will continue to add new water efficient landscape areas throughout the State. EMWD recommends the goal be revised to "reduce potable water use on urban landscapes on the order of fifty percent per acre over pre-drought level over the next 20 years". This recognizes that there will be an increase in landscape areas as economic development occurs, but that we should be working towards improving water efficiency in all landscaping.

Section 7, Recommendation #4: Piloting Connection Charges that Promote Landscape Efficiency

As utilities plan for facilities needed to accommodate future customers, demand for new development is considered. Average and peak demand can be influenced by many factors including landscape choices. The impact of landscape efficiency requirements should be included in demand projections that are used to size capital facilities. In some cases, a lower peak demand may result in a reduction in the size of facilities. This reduction in the need for facilities should then be reflected in the cost of connection fees.

Connection fees should not be tiered based on improvements in water use efficiency installed at the time of connection. Utilities run the risk of underfunding capital projects sized to accommodate average water use based on the zoning and intensity in place at the time of planning. EMWD recommends that in lieu of piloting connection charges that promote landscape efficiency, the ITP recommend developers be encouraged to increase efficiency in new development through other methods. This could include providing incentives to upgrade landscaping to improve long term efficiency or offering aesthetic improvements to standard landscapes to promote market transformation. This will allow a developer to market the benefit of these improvements to the end user, which allows the end user to benefit from long term water savings, and does not compromise a utilities ability to fund facilities and serve its customers responsibly.

We thank you again for considering our recommendations and look forward to working with you to improve water use efficiency in landscape across the state.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Lovsted", with a long, sweeping horizontal line extending to the right.

Elizabeth Lovsted
Senior Civil Engineer

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